

FILED

NOV 1 2018

DAVID CREWS, CLERK

BY

Deputy

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION

RACHEL HARRIS, GUARDIAN OF)
STEVEN JESSE HARRIS ON BEHALF)
OF STEVEN JESSE HARRIS)

PLAINTIFF

V.)

CAUSE NO. 1:18cv 167-SA-RP

CLAY COUNTY, MISSISSIPPI, et al)

DEFENDANTS

**ANSWER TO PLAINTIFF'S
FIRST AMENDED COMPLAINT**

COMES NOW, Nancy Stuart, Defendant, *pro se*, and files this her answer to the Plaintiff's First Amended Complaint, to-wit:

INTRODUCTION

1. DENIED
2. DENIED
3. DENIED
4. DENIED
5. DENIED

JURISDICTION AND VENUE

6. DENIED

THE PARTIES

7. DENIED
8. DENIED
9. DENIED
10. DENIED
11. DENIED
12. DENIED

13. DENIED

14. DENIED

15. DENIED

16. DENIED

17. DENIED

GENERAL ALLEGATIONS

18. DENIED

19. DENIED

20. DENIED

21. DENIED

22. DENIED

23. DENIED

24. DENIED

25. DENIED

26. DENIED

27. DENIED

28. DENIED

29. DENIED

30. DENIED

31. DENIED

32. DENIED

33. DENIED

34. DENIED

35. DENIED

36. DENIED

37. DENIED

38. DENIED

38. (*sic*) DENIED

COUNT ONE

39.DENIED

40. DENIED

41. DENIED

42. DENIED

43. DENIED

44. DENIED

45. DENIED

46. DENIED

47. DENIED

48. DENIED

49. DENIED

50. DENIED

51. DENIED

52. DENIED

53. DENIED

54. DENIED

55. DENIED

56. DENIED

57. DENIED

58. DENIED

COUNT II – MALICIOUS PROSECUTION

59. DENIED

60. DENIED

61. DENIED

62. DENIED

63. DENIED

64. DENIED

65. DENIED

66. DENIED

67. DENIED

68. DENIED

69. DENIED

70. DENIED

71. DENIED

72. DENIED

COUNT III-42 U.S.C SECTION 1983

73. DENIED

74. DENIED

75. DENIED

76. DENIED

77. DENIED

COUNT IV—STATE LAW CLAIM

78. DENIED

79. DENIED

80. DENIED

81. DENIED

82. DENIED

COUNT V- VIOLATION OF 14TH AMENDMENT RIGHTS

83. DENIED

84. DENIED

85. DENIED

86. DENIED

87. DENIED

88. DENIED

89. DENIED

90. DENIED

91. DENIED

92. DENIED

93. DENIED

94. DENIED

95. DENIED

96. DENIED

97. DENIED

98. DENIED

99. DENIED

100. DENIED

101. DENIED

102. DENIED

103. DENIED

COUNT VI-VIOLATION OF 13TH AND 14TH AMENDMENTS

104. DENIED

105. DENIED

106. DENIED

107. DENIED

108. DENIED

COUNT VII- NEGLIGENCE

109. DENIED

110. DENIED

111. DENIED

112. DENIED

113. DENIED

114. DENIED

115. DENIED

116. DENIED

117. DENIED

118. DENIED

119. DENIED

120. DENIED

121. DENIED

122. DENIED

123. DENIED

124. DENIED

125. DENIED

126. DENIED

127. DENIED

128. DENIED

129. DENIED

130. DENIED

COUNT VIII- GROSS NEGLIGENCE

131. DENIED

132. DENIED

133. DENIED

134. DENIED

135. DENIED

136. DENIED

137. DENIED

138. DENIED

139. DENIED

140. DENIED

141. DENIED

142. DENIED

143. DENIED

144. DENIED

145. DENIED

146. DENIED

147. DENIED

148. DENIED

149. DENIED

150. DENIED

151. DENIED

152. DENIED

COUNT IX—PUNITIVE DAMAGES

153. DENIED

154. DENIED

155. DENIED

156. DENIED


AND NOW HAVING FULLY ANSWERED, the allegations, Defendant Stuart denies the Plaintiff's Prayer for Relief should be granted, and further that the allegations be dismissed and Plaintiff held responsible for costs of court.

AFFIRMATIVE DEFENSES

Defendant Stuart raise the following affirmative defenses and upon a hearing thereon, that the complaint be wholly dismissed, to-wit:

1. Statute of Limitations
2. Rule 12 (b) 6 F.R.C.P.

Respectfully submitted this the 30th day of October, 2018.



Nancy H. Stuart, *pro se* Defendant
MSB#8005 (inactive)
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NOTICE OF CONVENTIONAL FILING

DEFENDANT'S ANSWER TO PLAINTIFF'S FIRST AMENDED
COMPLAINT can not be filed electronically. This document has been manually served
on all parties.

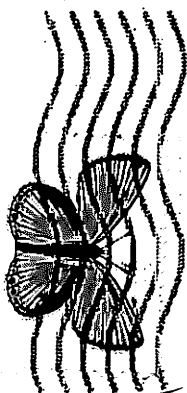
This the 30th day of October, 2018.


Nancy H. Stuart *pro se* Defendant
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John & Nancy Stuart
192 Lemon Tree Cir
Union Grove, AL 35175

BIRMINGHAM, AL 3520

30 OCT 2018 PM 1 L



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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI

38821-540203

